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Federal Communications Commission  
Office of Secretary

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of )  
 )  
Advanced Television Systems )  
and Their Impact Upon the ) MM Docket No. 87-268  
Existing Television Broadcast )  
Service )

To: The Commission

**REPLY COMMENTS OF TELEVISION WISCONSIN, INC.**

Television Wisconsin, Inc. ("TV Wisconsin"), by its attorneys, hereby submits these Reply Comments in connection with the Commission's Sixth Further Notice of Proposed Rule Making ("Sixth FNPRM"), FCC 96-317, released August 14, 1996, 61 Fed. Reg. 43209 (August 21, 1996), in the above-captioned proceeding.

TV Wisconsin is the licensee of Television Station WISC-TV ("WISC") in Madison, Wisconsin.<sup>1</sup> It presently is authorized to operate WISC on Channel 3. In the Sixth FNPRM, the Commission proposes that Channel 29 be assigned to WISC for operation of digital television service. TV Wisconsin agrees with the Commission's proposal to assign Channel 29 to WISC.

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<sup>1</sup> TV Wisconsin is affiliated with the "Morgan Murphy Group" of broadcast stations, which includes: Apple Valley Broadcasting, Inc., the licensee of Television Stations KAPP-TV in Yakima, Washington and KVEW-TV in Kennewick, Washington; Spokane Television, Inc., the licensee of KXLY-TV at Spokane, Washington; Spokane Radio, Inc., the licensee of Radio Stations KXLY(AM) and KXLY-FM at Spokane, Washington; and QueenB Radio, Inc., the licensee of Radio Stations KTRW(AM) and KZZU(FM) at Spokane, Washington.

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These Reply Comments are submitted in response to the "Modified DTV Allotment/Assignment Plan" ("Broadcasters' Plan") forwarded in this proceeding in the Broadcasters' Comments on the Sixth Notice of Proposed Rulemaking, filed November 22, 1996 ("Broadcasters' Comments"). The Broadcasters' Plan suggests that Channel 64 be assigned to WISC for digital operations. See Broadcasters' Comments at Appendix E2 (45). Although TV Wisconsin was a signatory to the Broadcasters' Comments and heartily endorses the general approach to preserving NTSC service and maximizing DTV coverage expressed therein,<sup>2</sup> it respectfully urges that Channel 29, rather than Channel 64, is the most appropriate channel assignment for WISC's digital operations.<sup>3</sup>

The substitution of Channel 29 for Channel 64 as the DTV assignment for WISC will not adversely effect the Broadcasters' Plan. Although the Broadcasters' Plan presently proposes that Channel 29 be assigned to Television Station WKOW (Channel 27) in Madison, Appendix E3 to the Broadcasters' Comments indicates that Station WKOW on November 6, 1996 requested that its proposed assignment be changed from Channel 29 to Channel 26. See Broadcasters' Comments, Appendix E3 at 17. As Channel 26 will have been vacated, the relocation (within the Broadcasters' Plan) of

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<sup>2</sup> Specifically, TV Wisconsin supports the Broadcasters' proposal that the full range of television channels (Channels 2 through 69) be preserved for DTV channel assignments.

<sup>3</sup> Concurrently herewith, TV Wisconsin is requesting Channel 29 through the channel coordination process established by the Broadcasters' Caucus and its affiliates.

WISC from Channel 64 to Channel 29 will not create displacement within the Broadcasters' Plan.<sup>4</sup>

WISC's technical analysis indicates that digital operations over Channel 29 will provide it with significantly better coverage of its service area than would be possible on Channel 64. As discussed in the Broadcasters' Comments, even a small increase in coverage is significant in the this context because, in a digital world, television viewers either are afforded perfect reception or no reception at all. See Broadcasters' Comments at 28.

In addition, the competitiveness of the Madison, Wisconsin market will be best-maintained by permitting WISC to retain its identity within the cluster of Madison stations in the Channel 19 through Channel 29 range. The Sixth FNPRM proposes that the four Madison stations presently authorized on lower NTSC channels (WISC, WMTV, WHA and WKOW) be clustered between Channel 19 and Channel 29. With the adjustment proposed herein, the Broadcasters' Plan will propose that the same four stations be grouped in the Channel 19 through Channel 29 range.

In conclusion, WISC's request that Channel 29 be assigned for its digital operations comports with the Commission's originally-proposed assignments, will cause no disruption in the channel

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<sup>4</sup> Relocation of WISC from Channel 64 to Channel 29 will assist in minimizing assignments in the Channel 60 through Channel 69 range where interference concerns have not been raised. See Broadcasters' Comments at 43. Channel 29, moreover, is at no risk of being displaced in the event the Commission opts to implement its "core spectrum" proposal.

coordination procedures established by the Broadcasters' Caucus and will serve the Commission's objectives of ensuring replication of current signal coverage and preserving the viability of existing free broadcast service. Accordingly, WISC respectfully requests that the Commission adhere to its initial conclusion that Channel 29 is the appropriate channel allocation for WISC's digital operations.

Respectfully submitted,  
**TELEVISION WISCONSIN, INC.**

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